

Davis Polk

Craig Cagney
+1 212 450 3162
craig.cagney@davispolk.com
davispolk.com

Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

June 28, 2021

Honorable Sarah Netburn
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Stansell v. FARC et al.*, Case No. 1:16-mc-00405-LGS-SN;
Status letter following June 14, 2021 conference concerning Citibank, N.A.'s forthcoming amended answer

Dear Judge Netburn:

We write pursuant to Your Honor's oral instruction at the June 14, 2021 conference with a status update concerning Citibank, N.A.'s ("Citibank") contemplated Third Amended Answer to Writ of Garnishment/Execution and Counterclaim and Crossclaims Seeking Relief in the Nature of Interpleader (the "Amended Answer"), related to accounts allegedly associated with Samark Jose Lopez Bello and Yakima Trading Corporation. The Amended Answer will supersede Citibank N.A.'s Second Amended Answer to Writ of Garnishment/Execution and Counterclaim and Crossclaims Seeking Relief in the Nature of Interpleader (Dkt. No. 93).

Since the conference, counsel for Citibank and counsel to the other parties before the Court with an interest in the Amended Answer have engaged in negotiations. Citibank and the Stansell and Pescatore plaintiffs have made progress towards a potential stipulation that will avoid the need for litigation over whether Citibank should be granted leave to file the Amended Answer, and Samark Jose Lopez Bello, Yakima Trading Corp., SIX SIS Ltd., and Antonio Caballero are now considering that proposal.

Citibank therefore respectfully requests additional time to complete these discussions. The parties will file either a proposed stipulation or a further status report on or before July 6, 2021.

Respectfully,

/s/ Craig T. Cagney

Craig T. Cagney
Counsel for Citibank, N.A. (excluding Banco de Venezuela, S.A. interpleader)